

March 9, 2010

12 C.F.R. Part 704 Comment Letter

We need our corporate to perform the normal back office services and also to provide liquidity and loans to us. Your proposals are unrealistic and the corporate cannot operate as you suggest. The proposed average life limit is in addition to NEV sensitivity test. This average life is therefore unnecessary.

The proposals on directors' terms is adverse. The mortgage security problem is universal and wasn't the result of directors' terms. The proposal would put the average life of a director at three years. This means that you would have inexperienced directors running the corporate.

The limits on director indemnification would mean that no one would serve on a corporate board. This is contrary to what every other for profit and not-for profit institution in the country has for indemnification.

Thank you for the opportunity to comment. Hopefully this can be resolved for the good of all credit unions.

Sincerely,

Ronald C. Linstromberg  
President  
DeKalb Financial Credit Union